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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11  
 :  
SquareTwo Financial Services : Case No. 17-10659 (JLG)  
Corporation, *et al.*,<sup>1</sup> :  
 : Jointly Administered  
Debtors. :  
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**JOINDER OF RESURGENT HOLDINGS LLC IN PLAN ADMINISTRATOR'S  
OBJECTIONS TO VICKI L. YOUNG'S AND CERTIFIED CLASSES OF OHIO  
CONSUMERS' MOTION FOR RELIEF FROM THE AUTOMATIC STAY AND DEREK  
SCHIAVONE'S MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

Resurgent Holdings LLC ("**Resurgent**"), through its counsel Foley & Lardner LLP, hereby joins (the "**Joinder**") in the Plan Administrator's<sup>2</sup> objection (the "**Young Objection**"), filed July 25, 2017 [Docket No. 370] to the Motion for Relief from Automatic Bankruptcy Stay Pursuant to Fed. R. Bankr. P. 4001 and 11 U.S.C. § 362(d) (the "**Young Motion**") [Docket No. 276] filed by Vicki L. Young and the Certified Classes of Ohio Consumers' (collectively, the

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<sup>1</sup> The Debtors in these chapter 11 cases and the last four digits of each Debtor's federal taxpayer identification number and/or Canadian equivalent are as follows: Astrum Financial, LLC (2265); Autus, LLC (2736); CA Internet Marketing, LLC (7434); CACH, LLC d/b/a Fresh View Funding (6162); CACV of Colorado, LLC (3409); CACV of New Jersey, LLC (3499); Candeo, LLC (2809); CCL Financial Inc. (7548); Collect Air, LLC (7987); Collect America of Canada, LLC (7137); Healthcare Funding Solutions, LLC (2985); Metropolitan Legal Administration Services, Inc. (6811); Orsa, LLC (2864); Preferred Credit Resources Limited (0637); ReFinance America, Ltd. (4359); SquareTwo Financial Canada Corporation (EIN: 1034; BN: 0174); SquareTwo Financial Corporation (1849); and SquareTwo Financial Services Corporation d/b/a Fresh View Solutions (5554). The Debtors' executive headquarters are located at 6300 South Syracuse Way, Suite 300, Centennial, CO 80111.

<sup>2</sup> Capitalized terms not defined herein shall have the meanings ascribed to them in the Objections and Motions, as applicable.

“**Class Claimants**”) against CACH, LLC (“**CACH**”) and SquareTwo Financial Services Corporation (“**SquareTwo**”) and the Plan Administrator’s objection (the “**Schiavoni Objection**” and together with the Young Objection, the “**Objections**”) filed July 25, 2017 [Docket No. 371] to the Motion for Relief from Automatic Bankruptcy Stay Pursuant to Fed. R. Bankr. P. 4001 and 11 U.S.C. § 362(d) (the “**Schiavone Motion**” and together with the Young Motion, the “**Motions**”) [Docket Nos. 301 & 301-1] filed by Derek Schiavone (“**Plaintiff**”) against CACH and SquareTwo and in support thereof, respectfully states:

1. Resurgent joins in the Plan Administrator’s Objections to the Motions for all of the reasons set forth in the Objections, including, but not limited to the Class Claimants’ failure to establish cause for relief from the plan injunction against CACH and SquareTwo.

2. Resurgent further states that complying with discovery requests would be a burden on Reorganized CACH and would be futile because the Plan and Confirmation Order prohibit any recovery from Reorganized CACH or its assets. Because recovery is futile, the attendant costs and burden of continued litigation is not justified.

3. Resurgent reserves its rights, including the right to assert additional objections at the hearing on the Motions.

## **CONCLUSION**

WHEREFORE, for all the reasons set forth in the Objections, Resurgent respectfully requests that the Court: (i) deny the Motions, and (ii) grant Resurgent such other relief as is just.

DATED: Chicago, Illinois  
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### **FOLEY & LARDNER LLP**

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